

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

**DECLARATION OF KEVIN GANNON IN SUPPORT OF PLAINTIFF’S REPLY IN
SUPPORT OF MOTION TO DEEM ADMITTED DEFENDANT’S INCOMPLETE AND
NON-RESPONSIVE ANSWERS TO THE AMENDED COMPLAINT**

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for the plaintiff, Singular Computing LLC (“Singular”).

2. I submit this declaration in support of Singular’s reply in support of its Motion to Deem Admitted Defendant’s Incomplete and Non-Responsive Answers to the Amended Complaint.

3. Attached as Exhibit B is a true and correct copy of excerpts from Singular’s First Set of Interrogatories to defendant, Google Inc.

4. Attached as Exhibit C is a true and correct copy of a paper titled “In-Datacenter Performance Analysis of a Tensor Processing Unit™” by Norman P. Jouppi, Jeffrey Dean *et al.*

5. Attached as Exhibit D is a true and correct copy of a letter from Matthias A. Kamber to Paul J. Hayes dated July 23, 2020.

Dated: September 4, 2020

/s/ Kevin Gannon